

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

  
U.S. Magistrate Judge

<b>JACKIE TOWNSEND, Mother and</b>	)	
<b>Next of Kin of GERALD TOWNSEND,</b>	)	
<b>Deceased,</b>	)	
	)	<b>Civil Action No. 3:08-0697</b>
<b>Plaintiff,</b>	)	
	)	<b>Judge Nixon</b>
<b>v.</b>	)	
	)	<b>Magistrate Judge Knowles</b>
<b>CORRECTIONS CORPORATION OF</b>	)	
<b>AMERICA, ANTHONY BOWLES,</b>	)	
<b>TAMMY BROWN, SEAN BURNETT,</b>	)	
<b>ELLERY CUNNINGHAM, DARREN</b>	)	
<b>DOUGLAS, LEONARD GARDNER,</b>	)	
<b>and ALICE LEWIS,</b>	)	<b>Jury Demand</b>
	)	
<b>Defendants.</b>	)	

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**PLAINTIFF’S MOTION FOR LEAVE TO FILE REPLY TO DEFENDANTS’  
RESPONSE IN OPPOSITION TO PLAINTIFF’S MOTION TO COMPEL AND  
EXTEND DISCOVERY DEADLINE**

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COMES NOW the Plaintiff, Jackie Townsend, Mother and Next of Kin of Gerald Townsend, Deceased (“Ms. Townsend”), by and through the undersigned, pursuant to LR 7.01(b), and respectfully requests permission to file a Reply to the Defendants’ Response in Opposition to Plaintiff’s Motion to Compel and Extend Discovery Deadline. (Defts.’ Resp. Opp. Mot. Comp., D.E. 55.) A copy of the proposed Reply is attached hereto as Exhibit 1.

The foundation of this Motion is that the discovery dispute before bar contemplates undeniably important evidentiary issues, and the principles of equity insist that Ms. Townsend be permitted to address the need for the relief sought in the underlying Motion. Likewise, granting Ms. Townsend leave to file the attached Reply